

Charlotte Greenlee

From: Tucker Player [<mailto:tucker@playerlawfirm.com>]
Sent: Wednesday, November 01, 2017 4:43 PM
To: Julia Crooks <JCrooks@abrfirm.com>
Cc: Justin Rodriguez <JRodriguez@abrfirm.com>
Subject: Re: Harrison

\$20k and they keep the dog. \$35k and dog returned pending health exam.

Sent from my iPhone

On Nov 1, 2017, at 6:05 PM, Julia Crooks <JCrooks@abrfirm.com> wrote:

Mr. Player,

Any word?

Thank you for your willingness to stipulate to a deadline extension on the motion to remand. Unfortunately, the Court does not have the authority to grant an extension even upon stipulation.

See Sandpiper Mgmt., LLC v. JP Morgan Chase & Co., No. 10CV1802, 2010 WL 4055567, at *1 (S.D. Cal. Oct. 15, 2010) ("The thirty-day time limit [set forth in 28 U.S.C. § 1446(b)] is mandatory, and is intended to prescribe a uniform time frame, at the beginning of immediately removable actions, within which removal will be effected." (internal quotation marks and citation omitted); *Harris Corp. v. Kollsman, Inc.*, 97 F. Supp. 2d 1148, 1151 (M.D. Fla. 2000) ("[S]ection 1446(b)'s mandatory removal period cannot be enlarged by court order, stipulation of the parties, or otherwise."). So we're really under the wire here.

Please let me know the latest.

Julia

From: Tucker Player [<mailto:tucker@playerlawfirm.com>]
Sent: Tuesday, October 31, 2017 12:59 PM
To: Julia Crooks <JCrooks@abrfirm.com>
Subject: Harrison

Trying to get a response from my client on the offer. keep playing phone tag. I will do my best to get an answer by tomorrow when you open.

If you need extension on motion to remand or disclosures, I will gladly consent.

Sorry for the delay.

dont' know Justin's email so forward to him as well please



Tucker S. Player
Player Law Firm, LLC
1415 Broad River Road
Columbia, SC 29210
ph: 803-772-8008
fx: 803-772-8037
email: tucker@playerlawfirm.com

The secret of freedom lies in educating people, whereas the secret of tyranny is in keeping them ignorant.

The information in this message is protected by the Attorney Client Privilege and/or Attorney Work Product Doctrine and is intended only for the use of the individual(s) named above. This message should not be forwarded without my permission. If this message is received in error or otherwise by someone other than the addressee, please contact me at the above number(s) and return the message or destroy it.